510(k) Summary of Safety and Effectiveness

Statement

Information supporting claims of substantial equivalence, as defined under the Federal Food, Drug and Cosmetic Act, respecting safety and effectiveness is summarized below. For the convenience of the Reviewer, this summary is formatted in accordance with the Agency's final rule "...510(k) Summaries and 510(k) Statements..." (21 CFR §807) and can be used to provide a substantial equivalence summary to anyone requesting it from the Agency.

Device description

The Niobe Magnetic Navigation System [MNS] is an interventional workstation for the navigation of appropriately equipped, magnetically adapted, devices (e.g., catheters or guidewires) through tissue to designated target sites. The system uses computer-controlled permanent magnets for orienting the tip of a magnetic device.

The system employs magnetic fields to *orient* or *steer* the tip of a magnetic device.

Intended use

The Niobe MNS is intended to navigate a magnetic device through tissue to designated target sites in the right and left heart and coronary vasculature by orienting the device tip in a desired direction.

Substantial equivalence

The Niobe MNS is substantially equivalent to the Telstar Magnetic Navigation System [MNS], K013484.

Technological characteristics

The Niobe Magnetic Navigation System employs application of magnetic fields to orient the distal tip of a magnetically-adapted device (e.g., catheter or guidewire).

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510(k) Summary of Safety and Effectiveness, Continued

Device comparisons – steering control The following is a comparison of the key features of the Niobe MNS vs. the predicate device, the Telstar MNS, K013484.

Device	New Device-	Predicate Device-
Characteristics	Niobe MNS	Telstar MNS
Intended use	To navigate a magnetic device through tissue to designated target sites in the right and left heart and coronary vasculature by orienting the device tip in a desired direction.	To navigate a magnetic device through tissue to designated target sites in the right and left heart and coronary vasculature by orienting the device tip in a desired direction.
Direct contact	No	No
with patient		
tissue		
Remote tableside physician control of steerable device distal orientation	Yes	Yes
Computer control of steerable device distal orientation	Yes	Yes
Conducted under fluoroscopic visualization	Yes	Yes

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510(k) Summary of Safety and Effectiveness, Continued

Physical testing	Performance testing has demonstrated substantial equivalence of the new device to the predicate device.
Preclinical animal and clinical performance data	The Niobe MNS is a modification of the predicate Telstar MNS. Clinical data are not necessary to support the modifications. Clinical application data for magnetic navigation were provided in K013484. Performance of the Niobe MNS was demonstrated in three canine studies.
Contact	Peter A. Takes, Ph.D., RAC Director, Clinical & Regulatory Affairs Stereotaxis, Inc. 4041 Forest Park Avenue St. Louis, Missouri 63108 Ph. 314-615-6964 Fax 314-615-6912
Date	January 14, 2003





Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

JAN 1 5 2003

Stereotaxis, Inc. c/o Peter A. Takes, Ph.D., RAC Director Clinical and Regulatory Affairs 4041 Forest Park Avenue St. Louis, Missouri 63108

Re: K021555

Trade Name: Niobe™ Magnetic Navigation System

Regulation Number: 21 CFR 870.1290

Regulation Name: Steerable Catheter Control System

Regulatory Class: Class II (two)

Product Code: DXX
Dated: December 6, 2002
Received: December 9, 2002

Dear Dr. Takes:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Page 2 – Peter A. Takes, Ph.D., RAC

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050. This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (301) 594-4646. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97) you may obtain. Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html

Sincerely yours,

BramiD. Zuckerman, M.D.

Director

Division of Cardiovascular Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

Appendix 2: Indications for Use Statement

Statement

Indications for Use Statement:

510(k) Number: K 021555

Device Name: Niobe Magnetic Navigation System [MNS]

Indications for Use: The Niobe MNS is intended to navigate a magnetic device through tissue to designated target sites in the right and left heart and coronary vasculature by orienting the device tip in a desired direction.

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Prescription Use V